



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA, : Civil No. 1:25MC 11
Plaintiff, :
 :
v. :
 :
 :
\$250,000.00 in U.S. CURRENCY :
Defendant. :

**MOTION FOR EXTENSION OF TIME TO FILE
VERIFIED COMPLAINT OF FORFEITURE**

Plaintiff United States of America, by and through Randall S. Galyon, Acting United States Attorney for the Middle District of North Carolina, and pursuant to 18 U.S.C. § 983(a)(3)(A), hereby respectfully moves the Court to extend the time within which to file a civil forfeiture complaint against the above-named property, seized on February 11, 2025, to and including September 1, 2025. The United States requests additional time for further investigation of the basis for forfeiture, and evaluation of the administrative claim.

Consent to the requested extension was given by attorney William Pruden, on behalf of Sun Tai Kim, the only person who submitted a claim in the administrative proceeding.

A proposed Order is attached.

WHEREFORE, plaintiff United States of America respectfully requests that the Court grant an extension of time to file a civil forfeiture Complaint against the above-

named property to and including September 1, 2025.

This the 2nd day of July, 2025.

Respectfully submitted,

RANDALL S. GALYON
Acting United States Attorney

/s/ Nathan L. Strup

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, the foregoing Motion for Extension of Time to file Verified Complaint of Forfeiture was filed with the Clerk of the Court, and I hereby certify that I have mailed the document to the following:

Addressee:

William Pruden
Pruden Law, PLLC
421 Fayetteville St Ste 1140,
Raleigh, North Carolina 27601

/s/ Nathan L. Strup
Nathan L. Strup
Assistant United States Attorney